UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- V. -

DEAN SKELOS and ADAM SKELOS,

Defendants.

S1 15 Cr. 317 (KMW)

DECLARATION OF ALEXANDRA A.E. SHAPIRO

ALEXANDRA A.E. SHAPIRO, pursuant to 28 U.S.C. § 1746, declares as follows:

- 1. I am a member of the Bar of this Court and a partner at Shapiro Arato LLP, attorneys for Defendant Dean Skelos. I submit this declaration in opposition to the motions to quash the subpoenas served by Defendants on the New York Department of Financial Services ("DFS"), Administrators for the Professions ("AFP"), Physicians' Reciprocal Insurers ("PRI"), Anthony Bonomo, and Carl Bonomo.
- 2. Attached hereto as Exhibit A is a true and correct copy of DFS's Order dated July 6, 2017 revoking AFP's authority to act as attorney-in-fact for PRI.
- 3. Attached hereto as Exhibit B is a true and correct copy of GX 714, the non-prosecution agreement between Anthony Bonomo and the government dated July 17, 2015.
- 4. Attached hereto as Exhibit C is a true and correct copy of the Verified Petition filed in *Physicians' Reciprocal Insurers v. Administrators for the Professions, Inc.*, Index No. 606636/2017 (Sup. Ct. Nassau Cty. July 11, 2017) ("*PRI v. AFP*"), as Doc. No. 1.
- 5. Attached hereto as Exhibit D is a true and correct copy of the Affidavit of Bruce C. Shulan filed in *PRI v. AFP* as Doc. No. 11.

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6. Attached hereto as Exhibit E is a true and correct copy of Exhibit 5 to the

Affidavit of Bruce C. Shulan identified above, which was filed in PRI v. AFP as Doc. No. 16.

7. Attached hereto as Exhibit F is a true and correct copy of PRI's demand for

arbitration against AFP filed in PRI v. AFP as Doc. No. 22.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 23, 2018

New York, New York

/s/ Alexandra A.E. Shapiro ALEXANDRA A.E. SHAPIRO